

# EXHIBIT Q

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA EMAIL

September 22, 2017

Steven T. Cottreau, Esq.  
Jones Day  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001-2113

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Steve:

Following the parties' most recent meet-and-confer concerning plaintiffs' search term list, we conducted a careful review of the 47 individuals and entities at issue, as identified in your August 14, 2017 letter. In a final attempt to reach a compromise with your client, plaintiffs will agree to remove another 5 individuals and entities from their list. Plaintiffs have now eliminated a total of 126 individuals and entities (and all associated aliases) from their original list of 500 provided to Dubai Islamic Bank ("DIB") on October 10, 2016.

In ruling that plaintiffs could provide DIB with a list of 500 individuals, accounts, and entities of their choosing, and that DIB would be required to search for records relating to those individuals, accounts, and entities, Magistrate Judge Maas clearly precluded DIB from further litigating issues such as the relevance of the individuals, accounts, and entities selected by plaintiffs. Indeed, the entire point of Magistrate Judge Maas's approach was to avoid going down that rabbit hole. Nonetheless, in the hopes of avoiding further motion practice, plaintiffs are providing below brief explanations of the relevance of the remaining 42 individuals and entities. We should note that we remain particularly puzzled by your objections to conducting searches relating to the International Islamic Relief Organization ("IIRO"), given that it is a defendant in the case (whose motion to dismiss was denied), and recognizing that several of its offices and officials were designated by the U.S. government. In any case, our summaries follow.

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 2

---

1. Special Chechen Refugees Assistance Fund – According to the Russian Federation’s Federal Security Service (“FSB”), a “number of charity organizations and foundations in the United Arab Emirates provide quite impressive material support for Chechen extremist groups. For example, the Sharja affiliation of the Saudi ‘International Islamic Relief Organization’ and the ‘Human Appeal International’ established the ‘Special Chechen Refugees Assistance Fund’ (account number 01520483656101 in the ‘Islamic Bank of Dubai.’).” See BUR-PEC014984-14987.
2. International Islamic Relief Organization – On August 3, 2006, the U.S. Treasury Department designated the IIRO’s Philippine and Indonesian branch offices and a senior IIRO official in Saudi Arabia, Abd al Hamid Sulaiman al Mujil, “for facilitating fundraising for al Qaida and affiliated terrorist groups.” According to U.S. Treasury officials, “Abd Al Hamid Sulaiman Al-Mujil, a high ranking IIRO official in Saudi Arabia, has used his position to bankroll the al Qaida network in Southeast Asia. Al Mujil has a long record of supporting Islamic militant groups, and he has maintained a cell of regular financial donors in the Middle East who support extremist causes.” U.S. State Department diplomatic cables further identify IIRO as “the principal sponsor of terrorist training camps in Afghanistan during the Taliban regime” and indicate that “Usama bin Ladin used the entire IIRO network for his terrorist activities.” See June 2004 and February 13, 2007 State Department cables. Moreover, a 1996 CIA Report concerning the involvement of purported charities in the sponsorship of terrorism indicates that the IIRO provided the funding for six al Qaeda training camps in Afghanistan.

See also FSB intelligence document at BUR-PEC014984-14987, stating that “the Sharja affiliation of the Saudi ‘International Islamic Relief Organization’ and the ‘Human Appeal International’ established the ‘Special Chechen Refugees Assistance Fund’ (account number 01520483656101 in the ‘Islamic Bank of Dubai.’”).

3. International Islamic Charity Organization – The International Islamic Charity Organization is a HAMAS entity. The U.S. Department of State designated HAMAS as a Foreign Terrorist Organization (“FTO”) on October 8, 1997.
4. Nablus Zakat Committee – The Nablus Zakat Committee is a HAMAS entity. The U.S. Department of State designated HAMAS as a Foreign Terrorist Organization (“FTO”) on October 8, 1997.
5. Al Fujairah Charity International – Al Fujairah Charity International is a HAMAS entity. The U.S. Department of State designated HAMAS as a Foreign Terrorist Organization (“FTO”) on October 8, 1997.
6. Emirates Red Crescent – The Emirates Red Crescent is a HAMAS entity. The U.S. Department of State designated HAMAS as a Foreign Terrorist Organization (“FTO”) on October 8, 1997.

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 3

---

7. Al Ihsan Charitable Society – The Al Ihsan Charitable Society is linked to both HAMAS and the Palestinian Islamic Jihad (“PIJ”) terrorist group. The U.S. Department of State designated HAMAS as a Foreign Terrorist Organization (“FTO”) on October 8, 1997. On May 4, 2005, the U.S. Treasury Department designated Al Ihsan pursuant to Executive Order 13224 as a charitable front for PIJ. According to Treasury, Al Ihsan served as the fund-raising arm of PIJ in Gaza and the West Bank, soliciting, collecting and distributing donations; cooperated with PIJ to distribute funds to the families of PIJ prisoners and deceased members; and opened youth centers to support PIJ activity and conduct PIJ-related recruitment and training.
8. Dar al Bir Society – According to a FSB intelligence document, the Dar al Bir Society provides extensive material support for Chechen extremist groups. “The Association of ‘Dar Al-Bir’ (account number 02520529179802) accumulates funds in [Dubai Islamic Bank] as well as in the ‘Islamic Bank of Abu Dhabi’ (account number 10068294), and the given funds are meant for terrorist units of Chechnya. Besides, by some data, the said association remits moneys to such organizations as HAMAS and ‘Jihad Islami.’” See BUR-PEC014984-14987.
9. Jamiat Dubai al Heiriyah – According to a FSB intelligence document, Jamiat Dubai al Heiriyah also provides material support to Chechen extremist groups. “The ‘Jamiyat Dubai Al-Heiriya’, too, holds a similar account, number 6828566, with the ‘Islamic Bank of Dubai.’” See BUR-PEC014984-14987.
10. Al Shamal Bank – According to an August 14, 1996 U.S. State Department factsheet on Osama bin Laden, “Bin Ladin and wealthy [National Islamic Front] NIF members capitalized Al-Shamal Islamic Bank in Khartoum. Bin Ladin invested \$50 million in the bank.” In addition, a 2002 Congressional Research Service Report confirmed bin Laden’s involvement in Al Shamal Bank:

In 1991, bin Laden relocated to Sudan with the approval of Sudan’s National Islamic Front (NIF) leader Hasan al-Turabi. There, in concert with NIF leaders, [bin Laden] built a network of businesses, including an Islamic Bank (al Shamal), an import-export firm, and firms that exported agricultural products. An engineer by training, bin Laden also used his family connections in the construction business to help Sudan build roads and airport facilities. The businesses in Sudan, some of which may still be operating, enabled him to offer safe haven and employment in Sudan to al-Qaeda members, promoting their involvement in radical Islamic movements in their countries of origin (especially Egypt) as well as anti-US terrorism.

*See CRS Report for Congress, Terrorism: Near Eastern Groups and State Sponsors, 2002, February 13, 2000, at p. 16. Moreover, during the 1998 U.S. embassies bombing trial, United States v. Usama Bin Laden, et al., Case No. S(7) 98 Cr. 1023 (S.D.N.Y.) (February 6, 2001), Jamal al Fadl, a former associate of Osama bin Laden and member of*

Steven T. Cottreau, Esq.  
September 22, 2017  
Page 4

---

al Qaeda, testified that Osama bin Laden and at least six al Qaeda operatives held bank accounts in Al Shamal under their real names:

Q. While you were in the Sudan, did you handle money for Usama Bin Laden?

A. *Could you repeat the question.*

Q. Did you work on the finances while you were in the Sudan?

A. *Yes.*

Q. Did you know where the bank accounts of Usama bin Laden and al Qaeda were?

A. *Yes.*

Q. Do you know whose names they were in?

A. *The bank account under Usama bin Laden Bank Shaml, Khartoum.*

Q. That was under Usama bin Laden's true name?

A. *Yes.*

Q. Were there accounts in other names?

A. *Yes. Afad Makkee got account also.*

Q. Afad Makkee, the account that he had under his name, do you know what that name is?

A. *I remember Madani Sidi al Tayyib.*

Q. Do you know of any other persons who had al Qaeda money in their accounts?

A. *Abu Rida al Suri.*

Q. Do you know his true name?

A. *Nidal.*

Q. Anyone else that you knew had al Qaeda money in bank accounts in their name?

A. *Abu Hajer al Iraqi.*

Steven T. Cottreau, Esq.  
September 22, 2017  
Page 5

---

Q. Do you know his true name?

A. *Mamdouh Salim.*

Q. Did you have any accounts in your name?

A. *Shared with Abu Fadhl.*

Q. So you had accounts in your name that were shared with Abu Fadhl?

A. *Yes.*

Q. Do you recall anyone else that had bank accounts in their name for al Qaeda?

A. *Abdoun al Mukhlafi.*

11. Abdullah Azzam – DIB’s collaboration with Osama bin Laden in the cause of violent jihad dates to the Afghan jihad. During that time, DIB maintained and serviced a jihad account for Abdallah Azzam, spiritual mentor to Osama bin Laden, co-founder of al Qaeda, and co-leader (with bin Laden) of the mujahideen during the “holy war” against the Soviet occupation of Afghanistan of the 1980s. In his book, “Ayyat al Rahman fee Jihad al-Afghan,” (“God’s Signs in the Afghan Jihad”), Azzam directs monetary donations for the Afghan mujahideen be sent to Account No. 1335 at Dubai Islamic Bank.
12. Ali Amin al Rashidi – Rashidi is a senior al Qaeda member who was present at the founding meetings of al Qaeda in Afghanistan in 1988, along with Osama bin Laden and Mamdouh Mahmoud Salim. Banshiri headed al Qaeda’s Military Committee and was considered “one of the most capable and popular leaders of al Qaeda.” See 9/11 Commission Report at p. 65. See also June 2, 2017 letter to DIB.
13. Abu Ubaidah al Banshiri – Alias for No. 12 above, Ali Amin al Rashidi. See June 2, 2017 letter to DIB.
14. IIRO – Alias for No. 2 above, International Islamic Relief Organization.
15. Igatha – Alias for No. 2 above, International Islamic Relief Organization.
16. Hay’at al-Igatha al-Islamiya al-‘Alamiyaa – Alias for No. 2 above, International Islamic Relief Organization.
17. Human Appeal International – According to a 1996 CIA Report concerning the involvement of purported charities in the sponsorship of terrorism, Human Appeal International “acts as a fundraiser for HAMAS,” and has connections to the Muwafaq Foundation which “helps fund the Egyptian Mujahedin battalion in Bosnia” and “also

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 6

---

funds at least one training camp in Afghanistan.” In a November 29, 2001 letter authored by David D. Aufhauser, Department of the Treasury General Counsel, Aufhauser explained to Swiss prosecutors that Muwafaq merged with al Qaeda in 2001.

*See also* FSB intelligence document at BUR-PEC014984-14987, stating that “the Sharja affiliation of the Saudi ‘International Islamic Relief Organization’ and the ‘Human Appeal International’ established the ‘Special Chechen Refugees Assistance Fund’ (account number 01520483656101 in the ‘Islamic Bank of Dubai.’”).

18. Al Kdrow – In an interview with Jamal al Fadl, a former al Qaeda official who became a cooperating witness for the United States, al Fadl testified that Mamdouh Mahmoud Salim ran the Al Kdrow company in Sudan. *See* June 2, 2017 letter to DIB.
19. Binjab Establishment – Binjab Establishment is a U.A.E. entity (P.O. Box 13621, Dubai), owned by Khalid Amer Ballayth. Ballayth has been described by the Swiss Federal Judicial Police as “a close associate of Osama Bin Laden.” *See* June 2, 2017 letter to DIB.
20. Healing Miracle Center – According to the U.S. government, Healing Miracle Center has “concrete ties to the Al-Qaida terrorist network.” *See* September 2001 U.S. State Department diplomatic cable originating from the Secretary of State’s office in Washington, D.C., *Terrorist Fundraising: Review of Candidates for Next Tranche of Designees*: “Department provides for posts a list of 40 organizations that [REDACTED] has determined have concrete ties to the Al-Qaida terrorist network.... The organizations and individuals are all being considered for inclusion in the annex to the recently signed terrorism fundraising executive order or for other measures to block their ability to provide funds to the Al-Qaida network ... Healing Miracle Center (Kuwait; probably UAE and Yemen).” *See* June 2, 2017 letter to DIB.
21. Rumat International – In an interview with Mamdouh Mahmoud Salim (founding member of al Qaeda who was found with three DIB banking cards under his name when he was arrested in September 1998 by German authorities for his role in the 1998 U.S. Embassy bombings), Salim testified that he worked for Rumat International in Dubai in 1997-1998. *See* June 2, 2017 letter to DIB.
22. Romat – Alias for No. 21 above, Rumat International. *See* June 2, 2017 letter to DIB.
23. Sana Trading (a/k/a Sana Trading Establishment) – Sana Trading is a U.A.E. entity (P.O. Box 13621, Dubai), owned by Khalid Amer Ballayth. Ballayth has been described by the Swiss Federal Judicial Police as “a close associate of Osama Bin Laden.” *See* June 2, 2017 letter to DIB.
24. Third World Relief Agency (a/k/a TWRA) – The TWRA is a purported charitable organization that became an integral component of al Qaeda’s support infrastructure. Founded in 1987 by Dr. El Fatih Ali Hassanein, a well-connected leader of the Sudanese

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 7

---

National Islamic Front (“NIF”) and fervent supporter of Osama bin Laden, the TWRA was a primary conduit for channeling financial, logistical, and operational support for al Qaeda’s global jihad. The 9/11 Commission concluded that Osama bin Laden used the TWRA to “covertly provide financial and other support for terrorist activities.” *See* 9/11 Report at p. 58. *See also* June 2, 2017 letter to DIB.

25. Union Beverage Company – As detailed in several U.S. Department of Defense Guantanamo Bay Detainee Assessments, the Union Beverage Company in the United Arab Emirates was used to funnel significant sums of money to the al Qaeda network. *See* April 4, 2008 JTF-GTMO Detainee Assessment for Sami Muheidine Mohamed al-Haj at p. 2 (“Detainee is reportedly a leader in the Muslim Brotherhood’s Shura Council and was involved in plans and operations to distribute weapons, to include Stinger missiles, and financial support to extremists in Chechnya. Detainee provided logistical support to Islamic militants in Chechnya through al-Haramayn in Baku-Azerbaijan (AZ), and acted as a money courier and propagandist for the al-Qaida network under the cover of his employment with the Union Beverage Company (UBC) and al-Jazeera Media.” *See also* May 5, 2008 JTF-GTMO Detainee Assessment for Jamal Muhammed Alwai at p. 8 (stating that the owner of Union Beverage Company sent money to the detainee for al Haramain). *See* June 2, 2017 letter to DIB.
26. Union Beverage Factory – Alias for No. 25 above, Union Beverage Company. *See* June 2, 2017 letter to DIB.
27. World Link Exchange (a/k/a World Link International Exchange) – Plaintiffs are willing to eliminate.
28. Abdelsamad Mohamed (a/k/a Abdul Samad Din Muhammed) – Mohamed was an employee at Union Beverage Company, and is the brother-in-law to senior Al Qaeda member Khalid Sheikh Mohammed (“KSM”). *See* April 4, 2008 JTF-GTMO Detainee Assessment for Sami Muheidine Mohamed al-Haj at p. 9. Mohamed also had a relationship with KSM’s nephew, Ali Abdul Aziz Ali (a/k/a Ammar al Baluchi). *See* March 28, 2007 Department of Defense Summary of Evidence for Combatant Status Review Tribunal for Ammar al Baluchi at p. 3. *See* June 2, 2017 letter to DIB.
29. Khalid Ali Walid – In an interview with Jamal al Fadl, a former al Qaeda official who became a cooperating witness for the United States, al Fadl testified that al Qaeda member Khalid Ali Walid was responsible for overseeing the financial records of al Qaeda while in Sudan. *See* June 2, 2017 letter to DIB.
30. Mohamed Ahmed Obaid Bin Mahfouz – Bin Mahfouz was an associate of Executive Order 13224 designee Yassin al Kadi and was responsible for overseeing the operations of the Muwafaq Foundation’s branch office in Islamabad, Pakistan. According to the U.S. Treasury Department, the Muwafaq Foundation merged with al Qaeda prior to the attacks of September 11, 2001. *See* November 29, 2001 letter from David D. Aufhauser, Department of the Treasury General Counsel, to Switzerland’s M. Claude Nicati,

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 8

Substitut du Procureur General. Additionally, bin Mahfouz had a close relationship with Khalid Amer Ballayth. *See* June 2, 2017 letter to DIB.

31. Saleh Salim al Shamsi – As described in a September 20, 2004 U.S. State Department diplomatic cable, U.S. Treasury Assistant Secretary Juan Zarate raised U.S. government concerns with U.A.E. Central Bank Governor Sultan Nasser al Suwaidi regarding “Al-Qaida financier Salah Salim Al-Shamsi,” suggesting “that the USG and the UAEG consider jointly submitting his name to the UN.” Zarate “explained that the U.S. had very specific concerns about this individual’s activities in regards to transferring funds to Al-Qaida and Iraqi Jihadists, and that we were concerned about Al-Shamsi’s network within the UAE.” Zarate “suggested that at a certain point we might want to think about jointly submitting this individual’s name to the UN.” *See* June 2, 2017 letter to DIB.
32. Dan International Trading & Investment Ltd. – Plaintiffs are willing to eliminate.
33. Darbar Charity – According to FBI documents, 9/11 hijacker Marwan al Shehhi was involved in approximately 20 financial transactions with Darbar Charity and its DIB bank account leading up to the 9/11 attacks.
34. Yasin Ahmed Mohamed Ali – A Sudanese businessman and director of Rowad Development and Investment Co. Ltd., a Sudanese company owned by the Muwafaq Foundation (Yassin al Kadi), Al Shamal Bank (Osama bin Laden), Wadi al Aqiq Corporation (Al Qaeda), and other shareholders. Banking records produced by defendant Yassin Kadi show large financial transfers from Solano, a Kadi company in Sudan, to Ali’s DIB account.
35. Ahmed Mohamed Ali Yasin – Alias for No. 34 above, Yasin Ahmed Mohamed Ali.
36. Binladen Overseas (Pvt. Ltd.) – Binladen Overseas, a Bin Laden family business and affiliate of the Saudi Binladin Group (“SBG”), was incorporated in the Jersey Channel Islands in the late 1980’s and had its principal place of business in Dubai. In 1989, Binladen Overseas was awarded a contract for the construction of the Port Sudan Airport in Sudan; the Public Buildings and Airports Division of SBG was responsible for the performance of the contract. *See* Affidavit of Omar Mohammad Binladin, ECF No. 2288. The airport construction project took place between February 1990 and mid-1992, the exact period of time in which al Qaeda was relocating from Afghanistan/Pakistan to Sudan. Osama bin Laden, still a SBG principal at the time, had an oversight role with the Port Sudan airport project.

While Binladen Overseas, SBG, and Osama bin Laden were performing lucrative construction work in Sudan, a period during which Osama remained an active member in the family’s businesses, Sudan served as a safe haven in which Osama could grow al Qaeda from a small jihadist army to what the 9/11 Commission Report deemed “a true global terrorist network.” *See* 9/11 Commission Report at p. 58.

Steven T. Cottreau, Esq.  
September 22, 2017  
Page 9

---

37. Fawaz Trading – According to “PENTTBOM Case Summary as of 1/11/2002”:
- “On July 7, 2000, Al Shehhi and Atta opened a joint bank account in Venice, Florida, with a \$7,000 deposit.... On August 30, 2000, and on September 18, 2000, a combined total of \$70,000 was wired to the account from ‘Hani’ of Fawaz Trading through the U.A.E. Exchange Center.”
  - “In July 2000, Al Shehhi opened a joint checking account with Mohamed Atta at Suntrust Bank in Florida. From July 2000 through September 2000 this account received what appears to be the primary funding for the conspiracy: four money transfers totaling \$110,000 from individuals within the U.A.E. identified only as Isam Mansour, Mr. Ali, and Hani/Fawaz Trading.”
  - “On September 18, 2000, Atta and al Shehhi’s joint Suntrust account received \$69,985 from ‘Hani’ (Fawaz Trading) in the United Arab Emirates. Hani listed 050-584-5685 as his phone number, the same phone number associated with an August 29, 2000 wire transfer to the same account by ‘Mr. Ali.’”
38. Twaik Est. – Plaintiffs are willing to eliminate.
39. Abdullah I. Lootah – Member of Lootah family associated with DIB.
40. Ahmed Ali Lootah – During the 1998 U.S. embassies bombing trial, *United States v. Usama Bin Laden, et al.*, Case No. S(7) 98 Cr. 1023 (S.D.N.Y.) (February 6, 2001), Jamal al Fadl, a former associate of Osama bin Laden and member of al Qaeda, testified that Lootah shared an account with al Qaeda member Khalifa al Omani:
- Q. Any other place you are aware of from your work where al Qaeda had money in accounts?
- A. *I don’t know the name of the bank, but I know they got account in Malaysia and in Hong Kong.*
- Q. In Malaysia and Hong Kong?
- A. *Yes.*
- Q. Any other places you are aware of?
- A. *I remember Khalifa al Omani, he got account in Dubai. He shared with Ahmed Ali Lootah.*
41. Mahmoud Hamra-Krouha – Plaintiffs are willing to eliminate.
42. Abu Hamada – Alias for Mustafa al Uzayti (No. 317 on Plaintiffs’ Amended Tranche No. 2). According to a September 10, 2008 Department of Defense Guantanamo Detainee

Steven T. Cottreau, Esq.  
 September 22, 2017  
 Page 10

---

Assessment, Uzayti (a/k/a Abu Faraj al Libi), “was the operational chief of al-Qaida and had long-term associations with Usama Bin Laden (UBL) and Dr. Ayman al-Zawahiri. Detainee managed al-Qaida operations, including al-Qaida operations in Iraq, after Khalid Shaykh Mouhammad’s, aka (KSM) ... capture. Detainee also directed al-Qaida operations against US and Coalition forces within Afghanistan (AF). Detainee planned and executed operations against the US and other nations, including an alleged 2003 assassination attempt against President Musharraf of Pakistan. Detainee provided safe havens for UBL and senior al-Qaida leader Dr. Ayman al-Zawahiri in 2001 and 2003. Detainee was an instructor and administrator at two al-Qaida training camps in Afghanistan.”

43. Saleh Abdelaziz Fahad – Plaintiffs are willing to eliminate.
44. Sameer Mohamed Mahmoud – Al Qaeda member. *See* Central Bank of the UAE circular, dated September 4, 2002 (DIB003435-3438), directing all financial institutions to search for “inward and outward remittances during the period from 1/1/2000 till 30/9/2001 in the following names”:

Mr. Sameer Mohamed Mahmoud Abu Onq (also known as Sameer Mohamed Mahmoud; Sameer M.M. Abu Ong), DOB 18/06/1965, POB Kingdom of Saudi Arabia, holder of Saudi passport No. C 669314, issued on 23/07/2001 and expires on 29/05/2006.

Mahmoud’s name appears in the circular along with other significant al Qaeda members closely connected to the 9/11 plot, including Khalid Sheikh Mohammed, Ali Abdul Aziz Ali, and Mustafa Ahmed al Hawsawi.

*See also* Central Bank of the UAE circular, dated August 25, 2002 (DIB003414-3416), directing all financial institutions to “search for immediately and freeze any accounts, deposits, investments or remittances in the names of the following”:

Mr. Sameer Mohamed Mahmoud Abu Onq (also known as Sameer Mohamed Mahmoud; Sameer M.M. Abu Ong), DOB 18/06/1965, POB Kingdom of Saudi Arabia, holder of Saudi passport No. C 669314, issued on 23/07/2001 and expires on 29/05/2006.

45. Yasser al Otaibi – Al Qaeda member. *See* Central Bank of the UAE circular, dated September 4, 2002 (DIB003435-3438), directing all financial institutions to search for “inward and outward remittances during the period from 1/1/2000 till 30/9/2001 in the following names”:

Mr. Yasser Badi Barak Al-Otaibi (also known as Yasser B.B. Al-Otaibi), DOB 17/04/1980, POB Riyadh, Kingdom of Saudi Arabia, holder of Saudi passport No. C 251615, issued in Riyadh, Kingdom of Saudi Arabia on 09/07/2000 and expires on 15/05/2005.

Steven T. Cottreau, Esq.  
September 22, 2017  
Page 11

---

Otaibi's name appears in the circular along with other significant al Qaeda members closely connected to the 9/11 plot, including Khalid Sheikh Mohammed, Ali Abdul Aziz Ali, and Mustafa Ahmed al Hawsawi.

*See also* Central Bank of the UAE circular, dated August 25, 2002 (DIB003414-3416), directing all financial institutions to "search for immediately and freeze any accounts, deposits, investments or remittances in the names of the following":

Mr. Yasser Badi Barak Al-Otaibi (also known as Yasser B.B. Al-Otaibi),  
DOB 17/04/1980, POB Riyadh, Kingdom of Saudi Arabia, holder of  
Saudi passport No. C 251615, issued in Riyadh, Kingdom of Saudi  
Arabia on 09/07/2000 and expires on 15/05/2005.

46. Abd al Latif al Imran – Owner of Union Beverage Company (a/k/a Union Beverage Factory). *See* Nos. 25 and 26 above. As detailed in several U.S. Department of Defense Guantanamo Bay Detainee Assessments, the Union Beverage Company in the United Arab Emirates was used to funnel significant sums of money to the al Qaeda network. *See* May 5, 2008 JTF-GTMO Detainee Assessment for Jamal Muhammed Alwai at p. 8 (stating that the owner of Union Beverage Company sent money to the detainee for al Haramain). *See* June 8, 2017 letter to DIB.
47. Skeikh Mohamed bin Saqar – According to the German government, on multiple occasions Sheikh Saqar authorized the transfer of funds from his account at DIB to the Third World Relief Agency's bank account in Vienna, Austria. *See* Expert Report of the Federal Office of Criminal Investigation relating to the judicial assistance request, ref. no. INV/10289/T09-PH(245), dated 8/27/2002 of the "Office of the Prosecutor" (OTP) of the International Court of Criminal Justice for the former Yugoslavia relating to the "Third World Relief Agency" (TWRA), Vienna/Austria, pp. 19, 20, and 57. The 9/11 Commission concluded that Osama bin Laden used the TWRA to "covertly provide financial and other support for terrorist activities." *See* 9/11 Report at p. 58. *See also* June 8, 2017 letter to DIB.

Finally, in response to plaintiffs' queries concerning the status and/or findings of DIB's search for documentation relating to the 1998 U.S. Embassy bombings, your August 14 letter states that DIB "included responsive documents in our supplemental productions following the March 22, 2015 hearing." At your earliest convenience, please identify all such responsive documents, including bates numbers, DIB contends relate to the embassy bombings.

Sincerely,

COZEN O'CONNOR



By: J. Scott Tarbutton

Steven T. Cottreau, Esq.  
September 22, 2017  
Page 12

---

cc: Members of Plaintiffs' Executive Committees

LEGAL\32613266\I